

RE: FAA 2001-10047-5

DEPT. OF TRANSPORTATION
OFFICE

Dear D.O.T.:

134456

I would like to comment on some of the issues involving subpart K.

01 JUL 23 PM 1:02

Regarding section 91.509 and 135.167 I believe that 30 minutes over water without safety equipment is too much time and distance. At speeds over 500 knots, this could leave an aircraft over 200 miles from land without safety equipment. If a flight crew were to have a fire or other reason for immediate landing, the lack of a life raft could be fatal.

Regarding the 60% rule I feel that FOARC is correct and the assumption that the rule is out dated and I agree with the recommendations.

Regarding section 91.1057 I feel that this is a crucial item. Time spent on standby should absolutely be considered duty time. It is impossible to ensure adequate rest while on extended periods of standby, sometimes reaching lengths of several days. Often times after long periods of standby time, crews are called out at any hour of the night. This situation is nothing but dangerous. You might as well be drunk as to try and perform after being up all day trying to plan your sleep cycle and then be surprised by a call after 48 hours of standby time. Standby *must* equal duty time.

91.1059 regarding the duty day limits: 16 hours is just too long. I have worked many 14 hour days and I can assure you that this is the maximum safe work day limit.

Sincerely,



Rob McKenna
ATP